

FILED

May 4, 2022

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS
By: WG
Deputy

SEALED

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

Cause No: SA:22-CR-00219-FB(1

UNITED STATES OF AMERICA

Plaintiff

v

GAVIN BLAKE DAVIS

Defendant

INDICTMENT

**COUNTS 1-3: 18 U.S.C. § 2261A(2)(B),
Cyberstalking**

**COUNT 4: 18 U.S.C § 875(c), Interstate
Communication – Threat to Injure**

THE GRAND JURY CHARGES:

COUNT ONE

[Cyberstalking - 18 U.S.C. § 2261A(2)(B)]

Beginning on or about October 22, 2020, and continuing through on or about March 22, 2022, in the Western District of Texas, and elsewhere, the Defendant,

GAVIN BLAKE DAVIS

with the intent to harass, intimidate and place under surveillance with intent to harass and intimidate another person, namely H.P., used an interactive computer service, electronic communication service, electronic communication system of interstate commerce, and other facility of interstate and foreign commerce to engage in a course of conduct that caused, attempted to cause, and would be reasonably expected to cause substantial emotional distress to H.P., all in violation of Title 18, United States Code, Section 2261A(2)(B).

COUNT TWO

[Cyberstalking - 18 U.S.C. § 2261A(2)(B)]

Beginning on or about October 22, 2020, and continuing through on or about March 22, 2022, in the Western District of Texas, and elsewhere, the Defendant,

GAVIN BLAKE DAVIS

with the intent to harass, intimidate and place under surveillance with intent to harass and intimidate another person, namely S.K., used an interactive computer service, electronic communication service, electronic communication system of interstate commerce, and other facility of interstate and foreign commerce to engage in a course of conduct that caused, attempted to cause, and would be reasonably expected to cause substantial emotional distress to S.K., all in violation of Title 18, United States Code, Section 2261A(2)(B).

COUNT THREE

[Cyberstalking - 18 U.S.C. § 2261A(2)(B)]

Beginning on or about October 22, 2020, and continuing through on or about March 22, 2022, in the Western District of Texas, and elsewhere, the Defendant,

GAVIN BLAKE DAVIS

with the intent to harass, intimidate and place under surveillance with intent to harass and intimidate another person, namely P.M., used an interactive computer service, electronic communication service, electronic communication system of interstate commerce, and other facility of interstate and foreign commerce to engage in a course of conduct that caused, attempted to cause, and would be reasonably expected to cause substantial emotional distress to P.M., all in violation of Title 18, United States Code, Section 2261A(2)(B).

COUNT FOUR

[18 U.S.C. § 875(c)]

On or about December 24, 2020, in the Western District of Texas, and elsewhere, the defendant,

GAVIN BLAKE DAVIS,

knowingly and willfully did transmit in interstate and foreign commerce, a communication,

specifically, an email, to H.P., and the communication contained a threat to injure C.K., in violation of Title 18, United States Code, Section 875(c).

A TRUE BILL



FOREPERSON OF THE GRAND JURY

ASHLEY C. HOFF
UNITED STATES ATTORNEY

BY:

A handwritten signature in blue ink, appearing to be "B/R", written over a horizontal line.

FOR BETTINA J. RICHARDSON
Assistant United States Attorney